

Application No. 09/683,238

### REMARKS

The Office Action of December 3, 2004 has been carefully considered. Reconsideration of this application, as amended, is respectfully requested. Claims 1-18 and 21-22 are pending in this application. Of these, claims 1, 11, and 21 are independent claims.

This Amendment amends claims 1, 4-7, 9, 11-18, cancels claims 19-20, and adds claims 21-22. Support for these amendments is found in paragraphs 0156-0180 and 0564-0575 of Applicant's specification, and figures referred therein.

In addition, this Amendment amends the specification to correct typographical errors, add reference numbers identified in the drawings but not referred to in the specification, and adds patent and application numbers that were not known at the time of filing.

Accordingly, no new matter is believed to be added by these amendments.

#### 1. Response to Rejection Under 35 USC 103(a)

The Office Action, beginning on page 2, rejects claims 1-4, 11-12, 16, and 19 under 35 USC 103(a) as being unpatentable over Horowitz et al., U.S. Patent No. 6,122,647 (hereinafter referred to as Horowitz) in view of Spellman et al., U.S. Patent No. 6,667,747 (hereinafter referred to as Spellman). In response thereto, Applicant amends independent claims 1 and 11 and replaces independent claim 19 with independent claim 21. Independent claim 1 is discussed below as the representative claim detailing a method for which claims 11 and 21 are directed at a corresponding apparatus and article of manufacture. Applicant amends claim 1 to more clearly set forth what is believed to be Applicant's invention in view of the cited references Horowitz and Spellman.

Horowitz discloses a method for creating contextual hyperlinks in a source document, where the hyperlinks associate the source document with available target documents. The method includes selecting terms relevant to the user through linguistic analysis, from which relevant target documents are identified. A tagging module receives user selected portions of a document and selects terms to be used for establishing contextual links. A presentation module identifies topics in the knowledge base associated with the selected terms, and creates hyperlinks between

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the terms in the source document and target documents. (See Horowitz Abstract.)

Spellman discloses a method for providing a hyperlink within a computer program that accesses information outside the computer program. In one embodiment, a hyperlink is provided in one help file within a first autonomous computer program, wherein the hyperlink references information in another help file within a second autonomous computer program. When the second autonomous computer program is activated because its help file is referenced by the hyperlink, the second help file is displayed to the user by the second autonomous computer program. (See Spellman Abstract.)

In contrast, Applicant's invention recited in claim 1 concerns a method for enriching document content. The method, which is described in Applicant's specification in paragraphs 0156-0180, includes recording a digitally readable identifier of a personality identifier, together with context information when the personality identifier is recorded. Further, the claimed method provides that the personality identifier is associated with a personality in a database of personalities. In addition, the claimed method provides that document content identified using the recorded context information is enriched with the associated personality that defines a set of document service requests identifying enrichment themes, for recognizing and annotating entities in the identified document content related to the associated personality.

Applicant respectfully submits that Horowitz, which discloses that a selected portion of a document is used to generate links to relevant documents with topics that are identified by a knowledge base associated with selected terms in the identified portion, taken singly or in combination with Spellman fails to disclose or suggest, the recording of a digitally readable personality identifier that is associated with a personality in a database of personalities as claimed by Applicant, which as disclosed by Applicant may be, for example, recorded from an electronic tag (as shown at 502 in Figure 5) or recorded from embedded data of a hardcopy document (as shown at 612 in Figure 6), where context information, as claimed by Applicant, is recorded when the personality identifier is recorded and used to identify document content, which is subsequently enriched using the associated personality.

Accordingly, Applicant respectfully submits that independent claim 1 as

amended are patentably distinguishable over Horowitz taken singly or in combination with Spellman. In addition, it should be noted that independent claims 11 and 21 contain the very similar limitations to those discussed above with respect to claim 1, and therefore the argument presented above with regard to claim 1 applies equally to independent claims 11 and 21.

Insofar as claims 2-4, 12, and 16 are concerned, these claims depend from one of now presumably allowable independent claims 1 or 11 and are also believed to be in allowable condition. Insofar as claim 19 is concerned, it has been canceled, thereby making its rejection moot.

In addition, the Office Action, starting on page 5, rejects claims 5-7 and 14-15 under 35 USC 103(a) as being unpatentable over Horowitz in view of Spellman (as applied to claims 1 and 11) and further in view of Levy et al., U.S. Patent Application Publication 2002/0138456 (hereinafter referred to as Levy). Further, the Office Action, starting on page 6, rejects claims 8-9, 17-18, and 20 under 35 USC 103(a) as being unpatentable over Horowitz in view of Spellman (as applied to claims 1, 11, and 19) and further in view of Goodisman et al., U.S. Patent Application Publication 2002/0069223 (hereinafter referred to as Goodisman). Also, the Office Action, on page 7, rejects claim 13 under 35 USC 103(a) as being unpatentable over Horowitz in view of Spellman (as applied to claim 11) and further in view of Hoover, U.S. Patent No. 6,753,977 (hereinafter referred to as Hoover). Finally, the Office Action, on page 8, rejects claim 10 under 35 USC 103(a) as being unpatentable over Horowitz in view of Spellman (as applied to claim 1) and further in view of Keith Jr., U.S. Patent Application Publication 2002/0032672 (hereinafter referred to as Keith). Reconsideration and withdrawal of the rejection of these rejected claims under 35 U.S.C 103 based on a combination of Horowitz and Spellman in view of Levy, Goodisman, Hoover, or Keith is also respectfully requested. There is no need to specifically address the merits of claims 5-7, 14-15, 8-10, 13, and 17-18 because each depends from one of claims 1 and 11 which is clearly patentable for the reasons set forth above. Insofar as claim 20 is concerned, it has been canceled, thereby making its rejection moot.

## 2. Fee Authorization And Extension Of Time

No additional fee is believed to be required for this amendment or response,

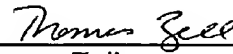
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however, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

### 3. Conclusion

In view of the foregoing remarks, reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is hereby requested to call Attorney for Applicant(s), Thomas Zell.

Respectfully submitted,



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